

KTC:GSG  
F.#2006R01615

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**CR 06 606**  
**DEARIE, J.**

- - - - - X

UNITED STATES OF AMERICA

**MATSUMOTO, M.J.**  
**I N D I C T M E N T**

- against -

VIJAYASHANTHAR PATPANATHAN,  
also known as "Chandru,"  
LOGESWARAN KRISHNAMOORTHY,  
also known as "Logan,"  
THILEEPAN PATPANATHAN, and  
SUJEEPAN PATPANATHAN,

(T. 8, U.S.C., §§  
1324(a)(1)(A)(iv),  
1324(a)(1)(A)(v)(I),  
1324(a)(1)(B)(i) and  
1324(a)(1)(B)(ii); T.  
18, U.S.C., §§  
201(b)(1)(A), 371, 2  
and 3551 et seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

9/12/06  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
SET 12/06 \*  
BROOKLYN OFFICE

COUNT ONE

(Conspiracy to Bribe a Public Official)

1. In or about and between October 2001 and July 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIJAYASHANTHAR PATPANATHAN, also known as "Chandru," LOGESWARAN KRISHNAMOORTHY, also known as "Logan," THILEEPAN PATPANATHAN and SUJEEPAN PATPANATHAN, together with others, did knowingly and intentionally conspire to corruptly give, offer and promise, directly and indirectly, things of value, to wit: quantities of United States currency, to a public official, to wit: a federal agent purporting to be an immigration official (hereinafter the

"Immigration Official"), with intent to influence an official act, to wit: the determination by the United States government to admit certain aliens into the United States, in violation of Title 18, United States Code, Section 201(b)(1)(A).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants VIJAYASHANTHAR PATPANATHAN, LOGESWARAN KRISHNAMOORTHY, THILEEPAN PATPANATHAN and SUJEEPAN PATPANATHAN, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

a. On or about October 22, 2001, in Staten Island, New York, the defendant VIJAYASHANTHAR PATPANATHAN provided a Confidential Informant (hereinafter the "CI") with information concerning certain aliens to give to the Immigration Official.

b. On or about January 18, 2002, at Newark International Airport in New Jersey (hereinafter "Newark Airport"), the defendant VIJAYASHANTHAR PATPANATHAN gave the Immigration Official approximately \$5,500 in United States currency.

c. On or about January 31, 2002, in Staten Island, New York, the defendant VIJAYASHANTHAR PATPANATHAN provided the CI approximately \$500 in United States currency to give to the Immigration Official.

d. On or about March 1, 2002, at Newark Airport, the defendant VIJAYASHANTHAR PATPANATHAN gave the Immigration Official approximately \$6,000 in United States currency.

e. On or about May 10, 2002, at Newark Airport, the defendant VIJAYASHANTHAR PATPANATHAN gave the Immigration Official approximately \$13,500 in United States currency.

f. On or about July 1, 2002, at Newark Airport, the defendant VIJAYASHANTHAR PATPANATHAN gave the Immigration Official approximately \$10,500 in United States currency.

g. On or about March 19, 2006, in Staten Island, New York, the defendants VIJAYASHANTHAR PATPANATHAN, THILEEPAN PATPANATHAN and SUJEEPAN PATPANATHAN telephoned the Immigration Official and offered the Immigration Official \$3,000 in United States currency to prevent THILEEPAN PATPANATHAN and SUJEEPAN PATPANATHAN from being deported from the United States.

h. On or about March 19, 2006, in Staten Island, New York, the defendants VIJAYASHANTHAR PATPANATHAN, THILEEPAN PATPANATHAN and SUJEEPAN PATPANATHAN provided the CI approximately \$1,400 in United States currency to give to the Immigration Official.

i. On or about May 12, 2006, in the Buffalo, New York area, the defendant VIJAYASHANTHAR PATPANATHAN deposited approximately \$1,600 in United States currency into the CI's bank account at Bank of America and instructed the CI to provide the money to the Immigration Official.

j. On or about June 14, 2006, in Queens, New York, the defendant LOGESWARAN KRISHNAMOORTHY gave the CI approximately \$5,000 in United States currency to give to the Immigration Official.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNTS TWO THROUGH NINE  
(Bribery of a Public Official)

3. On or about the dates indicated below, within the Eastern District of New York and elsewhere, the defendants listed below, together with others, did knowingly, intentionally and corruptly give, offer and promise, directly and indirectly, a thing of value as set forth below, to a public official, to wit:

the Immigration Official, with intent to influence an official act, to wit: the determination by the United States government to admit certain aliens into the United States:

COUNT	DATE	DEFENDANT(S)	THING OF VALUE
TWO	January 18, 2002	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru"	Approximately \$5,500 in United States Currency
THREE	January 31, 2002	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru"	Approximately \$500 in United States Currency
FOUR	March 1, 2002	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru"	Approximately \$6,000 in United States Currency
FIVE	May 10, 2002	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru"	Approximately \$13,500 in United States Currency
SIX	July 1, 2002	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru"	Approximately \$10,500 in United States Currency
SEVEN	March 19, 2006	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru," THILEEPAN PATPANATHAN, and SUJEEPAN PATPANATHAN	Approximately \$1,400 in United States Currency

COUNT	DATE	DEFENDANT(S)	THING OF VALUE
EIGHT	May 12, 2006	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru," THILEEPAN PATPANATHAN and SUJEEPAN PATPANATHAN	Approximately \$1,600 in United States Currency
NINE	June 14, 2006	VIJAYASHANTHAR PATPANATHAN, also known as "Chandru," and LOGESWARAN KRISHNAMOORTHY, also known as "Logan"	Approximately \$5,000 in United States Currency

(Title 18, United States Code, Sections 201(b)(1)(A), 2  
and 3551 et seq.)

COUNT TEN  
(Alien Smuggling Conspiracy)

4. In or about and between October 2001 and July 2006, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIJAYASHANTHAR PATPANATHAN, also known as "Chandru," and LOGESWARAN KRISHNAMOORTHY, also known as "Logan," together with others, did knowingly and intentionally conspire to encourage and induce aliens to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming

to, entry and residence in the United States was and would be in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

(Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i); Title 18, United States Code, Sections 3551 et seq.)

COUNTS ELEVEN THROUGH SIXTEEN  
(Alien Smuggling)

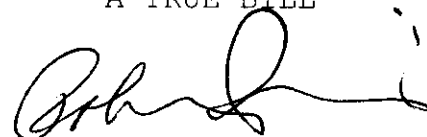
5. On or about the dates indicated below, within the Eastern District of New York and elsewhere, the defendant VIJAYASHANTHAR PATPANATHAN, also known as "Chandru," together with others, did knowingly and intentionally encourage and induce the aliens listed below, whose identities are specified below or are known to the Grand Jury, to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry and residence in the United States was and would be in violation of law:

COUNT	DATE	ALIEN
ELEVEN	January 18, 2002	THILEEPAN PATPANATHAN
TWELVE	March 1, 2002	John Doe #1
THIRTEEN	May 10, 2002	John Doe #2
FOURTEEN	May 10, 2002	John Doe #3
FIFTEEN	May 10, 2002	John Doe #4

COUNT	DATE	ALIEN
SIXTEEN	July 1, 2002	SUJEEPAN PATPANATHAN

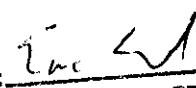
(Title 8, United States Code, Sections 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

A TRUE BILL



FOREPERSON

\_\_\_\_\_  
 ROSLYNN R. MAUSKOPF  
 UNITED STATES ATTORNEY  
 EASTERN DISTRICT OF NEW YORK

BY:  \_\_\_\_\_  
 ACTING UNITED STATES ATTORNEY  
 PURSUANT TO 28 C.F.R. 0.136



UNITED STATES DISTRICT COURTEASTERN DISTRICT of NEW YORK  
Criminal DivisionTHE UNITED STATES OF AMERICA

VIJAYASHANTHAR PATPANATHAN,  
also known as "Chandru,"  
LOGESWARAN KRISHNAMOORTHY,  
also known as "Logan,"  
THILEEPAN PATPANATHAN, and  
SUJEEPAN PATPANATHAN,  
Defendants.

I N D I C T M E N T

(T. 8, U.S.C., §§ 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(I),  
1324(a)(1)(B)(i) and 1324(a)(1)(B)(ii); T. 18, U.S.C., §§201(b)(1)(A),  
371, 2 and 3551 et seq.)

A true bill.



Foreman

Filed in open court this 12 day,of September A.D. 20 06

Clerk

Bail, \$ -----

AUSA Gurbir Grewal, (718) 254-6296

INFORMATION SHEET

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**CR 06 606**

1. Title of Case: United States v. Patapanathan, et al
2. Related Magistrate Docket Number(s) 06-886M  
**DEARIE J. MATSUMOTO, M.J.**
3. Arrest Date: August 21, 2006  
**FILED**  
**IN CLERK'S OFFICE**  
**U.S. DISTRICT COURT**
4. Nature of offense(s): ☒ **Felony**  
☐ **Misdemeanor**  
**★ SEP 11 2006 ★**  
**BROOKLYN OFFICE**
5. Related Civil or Criminal Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):  
\_\_\_\_\_
6. Projected Length of Trial: **Less than 6 weeks ( X )**  
**More than 6 Weeks ( )**
7. County in which crime was allegedly committed: QUEENS  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment been ordered sealed? ( ) Yes (X) No
9. Have arrest warrants been ordered? ( ) Yes (X) No
10. Is a capital count included in the indictment? ( ) Yes (X) No

ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

Gurbir S. Grewal  
Assistant U.S. Attorney  
(718) 254-6296

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RJD  
KAM